

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

VINCENT LAWRENCE,

Plaintiff,

v.

KALM FINANCIAL, INC., et al.,

Defendants.

CIVIL ACTION NO.:  
1:24-CV-11493-ADB

**DEFENDANT CROSSCOUNTRY MORTGAGE LLC.'S MOTION TO DISMISS  
FOR FAILURE TO STATE A CLAIM UNDER FED R. CIV. P. 8(a) AND 12(b)(6)**

Pursuant to Rules 8(a) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendant CrossCountry Mortgage, LLC. ("CrossCountry") moves for dismissal of all claims asserted in the Second Amended Complaint against CrossCountry. Plaintiff has failed to meet pleading notice requirements governed by Fed. R. Civ. P. 8(a) and state a claim against CrossCountry upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6). The grounds for this Motion are set forth in a separate Memorandum in Support of Dismissal, pursuant to Loc. R. 7.1(b)(1):



Dated: September 3, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of September, 2024, I electronically filed the foregoing **MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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